## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

In Re: Alice Mae Smith Case No. 13-31323-KLP Chapter 13

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JPMorgan Chase Bank, National Association, Movant

VS.

Alice Mae Smith aka Alice M. Smith, Debtor Wilbert Richardson II, Non-Filing Co-Debtor Suzanne E. Wade, Trustee

Respondent(s)

## AMENDED NOTICE OF MOTION FOR RELIEF FROM STAY AND CO-DEBTOR STAY AND HEARING THEREON

Real Property at 833 Bright Leaf Road, Lawrenceville, Virginia 23868

JPMorgan Chase Bank, National Association, Movant herein, has filed papers with the court seeking relief from the automatic stay of 11 U.S.C. Sec. 362 (a) to enable it to proceed with the foreclosure of its Deed of Trust. Your rights may be affected. You should read these papers carefully and discuss them with your lawyer, if you have one in this bankruptcy case. (If you do not have a lawyer, you may wish to consult one.)

The hearing is scheduled for <u>January 13, 2016 at 9:00 a.m.</u> in Courtroom 5100, United States Bankruptcy Court, 701 East Broad Street, Richmond, VA 23219. If you do not want the court to grant the motion for relief from stay, or if you want the court to consider your views of the motion, then by <u>fourteen (14)</u> for the Debtor and <u>twenty one</u> for the non-filing Co-Debtor, you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explaining your position and mail a copy to:

Justina Martynaityte, Esq.
Attorney for Movant
McCabe, Weisberg & Conway, LLC
312 Marshall Avenue, #800

## Laurel, Maryland 20707

If you mail, rather than deliver your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the court will receive it by the date stated above.

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

DATE: December 17, 2015

/s/ Justina Martynaityte, Esq.
Attorney for Movant
Bar No. 86858
McCabe, Weisberg & Conway, LLC
312 Marshall Avenue, #800
Laurel, MD 20707
301-490-1196
bankruptcyva@mwc-law.com

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on December 17, 2015, to Alice Mae Smith at 833 Bright Leaf Rd, Lawrenceville, Virginia 23868 and Wilbert Richardson II at 833 Bright Leaf Road, Lawrenceville, Virginia 23868. Copies were sent electronically via the CM/ECF system to Richard James Oulton, Attorney for Debtors and Suzanne E. Wade, Trustee.

/s/ Justina Martynaityte, Esq.